



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

August 6, 1991

Dr. James E. Crowley  
Project Coordinator  
CIBA-GEIGY Corporation  
444 Saw Mill River Road  
Ardsley, New York 10502-2699

RE: CIBA-GEIGY Consent Order: Cranston, RI Facility  
Phase I Interim Report and Phase II Proposal - Extension

Dear Dr. Crowley:

EPA has received your request, dated July 26, 1991, for an extension of the due date for submittal of the Phase I Interim Report and Phase II Proposal. EPA believes that the length of the extension requested is warranted based on the laboratory and other delays described in your letter and hereby approves a 12 week extension. The revised due date for submittal of the Phase I Interim Report and Phase II Proposal is November 6, 1991.

Frank Battaglia has informed me that he is working with your project team on some laboratory contingencies that should prevent these delays from occurring in the future. EPA is pleased to hear that you are taking the necessary steps to avoid future delays.

If you have any questions, please contact Frank Battaglia at (617) 573-9643.

Sincerely,

for Gary B. Gosbee, Chief  
MA & RI Waste Regulation Section

cc: Joel Blumstein, EPA  
Diane Leeber, CIBA-GEIGY



SEMS DocID

654254



August 6, 1991

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CONCURRENCES

SYMBOL	HPR	HPR					
SURNAME	B. Battaglia	G. Gosbee					
DATE	8/6/91	8-6-91					

CIBA-GEIGY Corporation  
444 Saw Mill River Road  
Ardsley, New York 10502-2699  
Telephone 914 479 5000

CIBA-GEIGY

July 26, 1991

REC'D 7-30-91  
F.B.

OK

Mr. Frank Battaglia  
Project Manager  
USEPA Region I  
Waste Management Building  
90 Canal Street  
Boston, Ma. 02114

**RE: EXTENDING THE INTERIM REPORT DEADLINE TO INCLUDE ROUND 2 DATA**

Dear Mr. Battaglia:

We have considered your request to include Round 2 data in the Phase I Interim Report and Phase II Proposal for the Cranston, RI facility. We will not be able to meet the delivery date currently scheduled for the report (14 August 1991) because the data has just been received and is not yet validated, loaded onto the data base or reviewed. As discussed with Woodward Clyde Consultants, an extension of 12 weeks would permit including this Round 2 data making the new target date for the report 6 November 1991.

As you requested, this letter reviews the benefits of including Round 2 data in the report, presents a detailed justification for the extension needed, and describes the impact that the extension would have on future project phases.

**BENEFITS OF THE PROPOSAL**

Including Round 2 data in the Phase I Interim Report and Phase II Proposal offers five main benefits:

**More complete contamination assessment.** Using both Round I and Round 2 data will permit a more complete characterization of the impacts of past and suspected releases.

**More focused Phase II approach.** Because the nature and extent of contamination will be evaluated more fully using both Round I and Round 2 data, the delineation activities proposed for Phase II will be more focused.

**Better selection of indicator compounds.** A better selection of indicator compounds can be proposed using both Round I and Round 2 data.

**Eliminate an additional deliverable.** Originally, a "post-Interim Report" was needed to update the Phase I Interim

Report, and possibly modify the Phase II Proposal, based on Round 2 data. Including the Round 2 data eliminates the need for a post-Interim Report.

**Shortened review time.** By including the Round 2 data and eliminating the post-Interim Report, the review time required for USEPA and its contractors will be reduced.

#### **Justification for the Extension**

An extension of 12 weeks is required to include the Round 2 data for three reasons:

**Analysis of Round 2 samples delayed.** Laboratory analysis of Round 2 samples was delayed. Originally, a 5-to-6-week turnaround time was anticipated for analysis of the Round 2 samples. However, delays at the laboratory resulted in an 11-to 12-week turnaround time for analyzing the Round 2 samples.

**Quality assurance of Round 2 data.** Additional validation and QA procedures will be required at the laboratory to ensure that the Round 2 analytical data delivered on diskette meet QA standards.

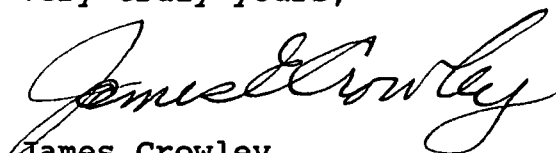
**Restructuring/rewriting parts of the report.** The verbal understanding (between USEPA and CIBA-GEIGY) about including Round 2 data was reached after parts of the report had been written. Selected sections (including figures and tables) will have to be restructured or rewritten to include the Round 2 data. This will take an additional 6 weeks including peer review and Ciba-Geigy approval.

An extended Project schedule is attached for Phase 1.

#### **Impact of the Extension**

The 12-week extension will not impact the schedule for future work plans because Phase II work would not have begun until the post-interim report was approved by the agency. In fact, because a single Phase I report and Phase II proposal will be delivered, the review may be expedited and future work may be implemented sooner.

Very truly yours,



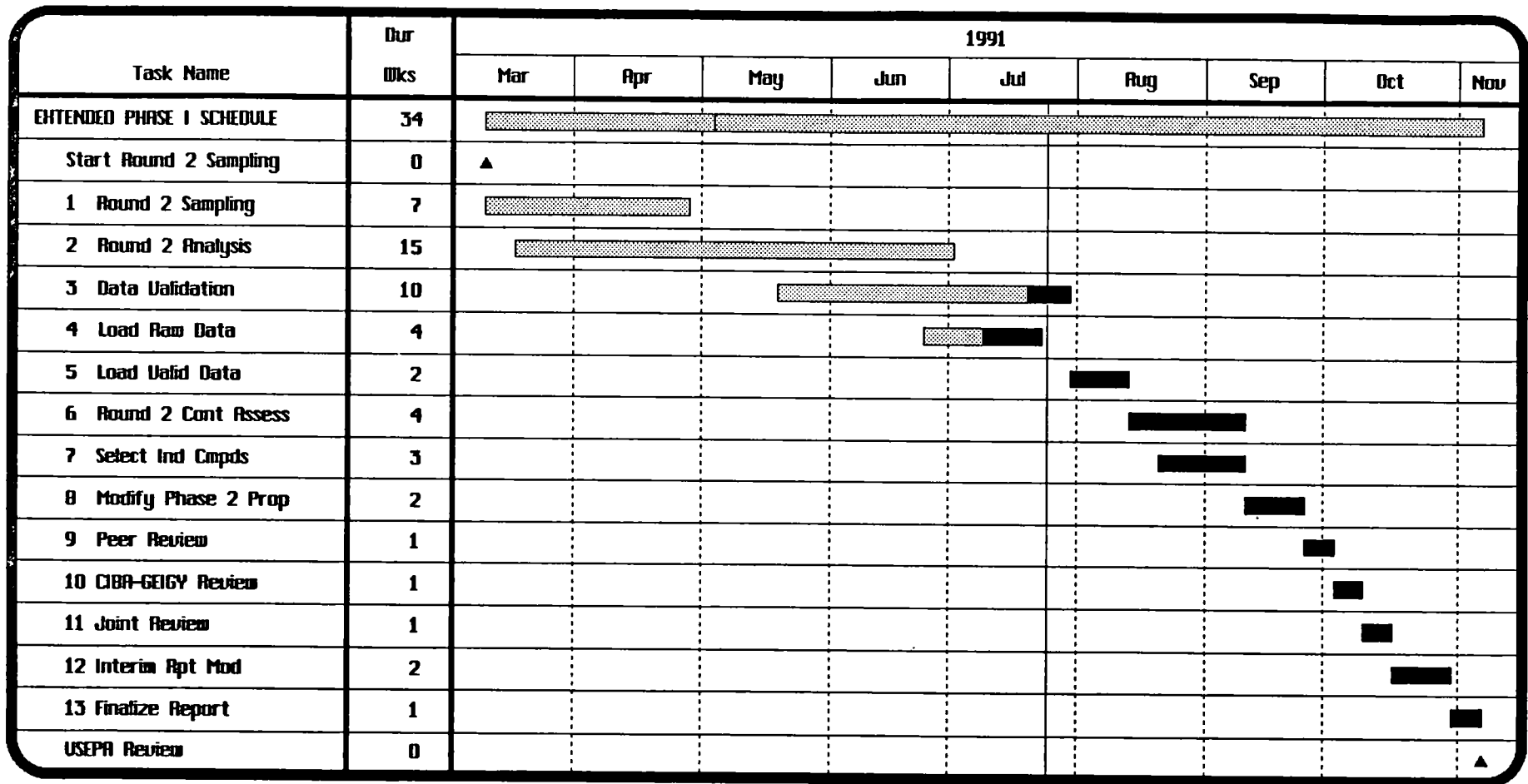
James Crowley  
Project Coordinator  
CIBA-GEIGY Corporation

JEC/110 Attachment

# RCRA Facility Investigation

## CIBA-GEIGY Facility - Cranston, Rhode Island

### Extended Phase I Schedule

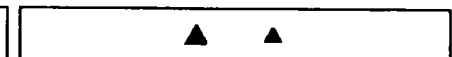


To include Round 2 data into Interim Report, a minimum extension of 12 weeks is required. The new target date for submitting this revised deliverable is now 6 November 1991.

Actual



Milestone





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

March 21, 1991

Dr. James E. Crowley  
Director, Environmental Control  
Ciba-Geigy Corporation  
444 Saw Mill River Road  
Ardsley, NY 10502

Re: Ciba-Geigy Consent Order: RCRA Docket No., I-88-1088  
Phase I - Round 2 River Sampling Strategy ~~==~~APPROVAL~~==~~  
Cranston, RI Facility

Dear Dr. Crowley:

The EPA has completed its review of Ciba-Geigy's Phase I, Round 2, River Sampling Strategy submitted with the February 1991 Monthly Report. The Agency has approved the Round 2 River Sampling Strategy under the condition that the following modifications are implemented:

- 1) Station SD-00M2 be sampled as indicated on Figure #3 of the river sampling strategy.
- 2) All Round 2 surface water samples be analyzed for the same parameters as in Round 1.

If these conditions are met, Round 2 river sampling can begin as planned on March 25, 1991. If you have any questions, I can be reached at (617) 573-9643.

Sincerely,

Frank Battaglia, EPA Project Manager  
MA & RI Waste Regulation Section

cc: Carol Wasserman, Office of Regional Counsel, EPA  
Mark Houlday, Woodward-Clyde Consultants

